

Exhibit L – State Public Utility Commission Orders and Decisions

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1325 G STREET N.W., SUITE 800
WASHINGTON, D.C. 20005

ORDER

June 30, 2017

**FORMAL CASE NO. EA 2017-08, IN THE MATTER OF THE APPLICATION
OF HOMEADE, LLC D/B/A ZENTILITY FOR AN ELECTRICITY SUPPLIER
LICENSE, Order No. 18825**

I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia ("Commission") grants a license to HomeADE, LLC d/b/a Zentility ("HomeADE" or "Applicant") to function as an electricity supplier in the District of Columbia.¹ The license for HomeADE, LLC d/b/a Zentility is effective upon issuance of this Order.

II. BACKGROUND

2. On March 3, 2017, HomeADE filed its license application.² Specifically, HomeADE intends to operate as a broker of electricity for commercial and industrial customers in the District of Columbia, pursuant to Section 34-1505 of the "Retail Electric Competition and Consumer Protection Act of 1999 ("Act")."³ Pursuant to the Commission's licensing requirements as set forth in Order No. 11796,⁴ HomeADE has provided the following information:

- a) Proof of technical and managerial competence;
- b) An affidavit of compliance with applicable Federal and District of Columbia environmental laws and regulations dated February 28, 2017;
- c) Proof of financial integrity to include financial statements;

¹ D.C. Official Code § 34-1501(17) (2001) defines, in part, an electricity supplier as "a person, including an aggregator, broker, or marketer, who generates electricity; sells electricity; or purchases, brokers, arranges or markets electricity for sale to customers."

² *Formal Case No. EA 2017-08, In the Matter of the Application of HomeADE, LLC d/b/a Zentility for an Electricity License ("Formal Case No. EA 2017-08")*, Application of HomeADE, LLC d/b/a Zentility filed March 3, 2017.

³ D.C. Official Code § 34-1505; *see generally* §§ 34-1501-1520.

⁴ *Formal Case No. 945, In the Matter of the Investigation into Electric Service Market Competition and Regulatory Practices*, Order No. 11796 at Attachment C, rel. September 20, 2000.

- d) Proof that HomeADE has registered with the Department of Consumer and Regulatory Affairs to do business in the District of Columbia;
- e) An affidavit dated February 28, 2017, stating that HomeADE is subject to all applicable taxes;
- f) An affidavit dated February 28, 2017, stating that HomeADE will comply with all the requirements of all orders and regulations of the Commission; and
- g) Applicant's website address: <http://www.zentility.com>.

HomeADE filed supplemental financial information on May 16 and June 2, 2017.⁵

III. DISCUSSION

3. Our review of the information contained in HomeADE's application, demonstrates that it has met all the prescribed licensing requirements and that the Applicant has the ability and the financial integrity to serve electricity customers in the District of Columbia. The Commission also finds that granting HomeADE's application will serve the public interest. Accordingly HomeADE's application is approved.

THEREFORE, IT IS ORDERED THAT:

4. The application of HomeADE, LLC d/b/a Zentility for a license to conduct business in the District of Columbia as an electricity supplier is hereby **GRANTED**. The license for HomeADE, LLC d/b/a Zentility is effective upon issuance of this Order.

A TRUE COPY:

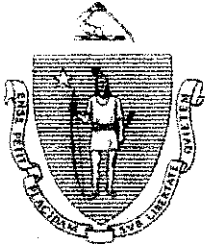
BY DIRECTION OF THE COMMISSION:



CHIEF CLERK:

**BRINDA WESTBROOK-SEDGWICK
COMMISSION SECRETARY**

⁵ Formal Case No. EA 2017-08, HomeADE filed supplemental financial information on May 16 and June 2, 2017.



THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

CHARLES D. BAKER
GOVERNOR

KARYN E. POLITO
LIEUTENANT GOVERNOR

MATTHEW A. BEATON
SECRETARY OF ENERGY
AND ENVIRONMENTAL AFFAIRS

ONE SOUTH STATION
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(617) 305-3500

ANGELA M. O'CONNOR
CHAIRMAN

ROBERT E. HAYDEN
COMMISSIONER

CECILE M. FRASER
COMMISSIONER

July 25, 2017

Ryan Peusch
President
HomeADE, LLC
1350 Magnolia Avenue
Annapolis, Maryland 21403

RE: Electricity Broker License Application

Dear Mr. Peusch,

The Department of Public Utilities ("Department") has reviewed the application of HomeADE, LLC ("HomeADE" or "Company") for an Electricity Broker license in the Commonwealth of Massachusetts, and is pleased to inform you that the Department has approved the application. HomeADE's license number is **EB-416**.

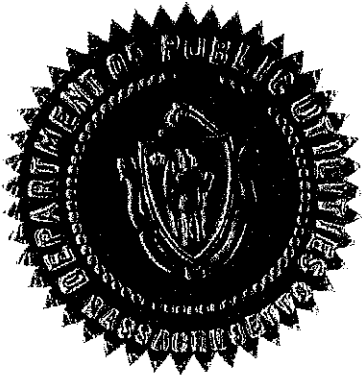
Consistent with the information provided in HomeADE's application, the activities the Company is licensed to provide are limited to electricity broker services to commercial and industrial customers. If, at a later date, the Company seeks to provide electricity broker services to residential customers, it must first seek and obtain Department approval when renewing its license.

As a condition of maintaining this license, HomeADE must comply with all relevant requirements of G.L. c. 164 and the regulations promulgated thereunder, including 220 C.M.R. §§ 11.00, 12.00 et seq. In addition, within 30 days of any material change in the information required by 220 C.M.R. § 11.05(2), the Company must file updated


Ryan Peusch, President
HomeADE, LLC

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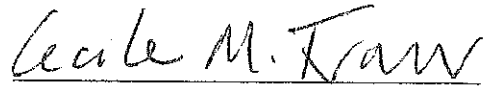
information with the Department. If HomeADE requests a renewal of its license next year, please submit the renewal application no later than **July 1, 2018**.



By Order of the Department,


Angela M. O'Connor, Chairman


Robert E. Hayden, Commissioner


Cecile M. Fraser, Commissioner

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17120**

Public Meeting held June 30, 2016

Commissioners Present:

Gladys M. Brown, Chairman
Andrew G. Place, Vice Chairman
John F. Coleman, Jr.
Robert F. Powelson
David W. Sweet

Application of Homeade LLC d/b/a Zentility for
Approval to Offer, Render, Furnish or Supply
Electricity or Electric Generation Services
as a Broker/Marketer

Docket Number:
A-2016-2545195

ORDER

BY THE COMMISSION:

On April 7, 2016, the Commission accepted Homeade LLC d/b/a Zentility's (Zentility), Utility Code 1118778, application seeking to become a licensed electric generation supplier (EGS) as a broker/marketer in all of the electric distribution company service territories throughout the Commonwealth of Pennsylvania. The application was filed pursuant to the Commission's regulations at 52 Pa. Code §§54.31-54.43, which became effective on August 8, 1998, and which were established under Section 2809 of the Public Utility Code, 66 Pa. C.S. §2809.

§2809 provides in pertinent part that:

License Requirement.--No person or corporation, including municipal corporations which choose to provide service outside their municipal limits except to the extent

provided prior to the effective date of this chapter, brokers and marketers, aggregators and other entities, shall engage in the business of an electric generation supplier in this Commonwealth unless the person or corporation holds a license issued by the Commission. 66 Pa. C.S. §2809.

An electric generation supplier is defined as:

A person or corporation, including municipal corporations which choose to provide service outside their municipal limits except to the extent provided prior to the effective date of this chapter, brokers and marketers, aggregators or any other entities, that sells to end-use customers electricity or related services utilizing the jurisdictional transmission or distribution facilities of an electric distribution company, or that purchases, brokers, arranges or markets electricity or related services for sale to end-use customers utilizing the jurisdictional transmission and distribution facilities of an electric distribution company. 66 Pa. C.S. §2803.

Zentility is a foreign limited liability company, formed in the State of Maryland as of April 24, 2014, and registered to do business in the Commonwealth of Pennsylvania on May 7, 2015. Zentility proposes to act as a broker/marketer of retail electric power to residential, small commercial (25 kw and under demand), large commercial (over 25 kw demand) industrial, and governmental customers. Zentility has indicated that it will not be taking title to electric power, nor paying customers' bills in its broker/marketer role.

Regarding the financial and technical requirements of the license application, Zentility has submitted twelve months of bank statements. Zentility has also supplied an extensive resume for its chief officer. We find that sufficient information has been provided by Zentility to demonstrate its financial and technical fitness in order to be licensed as a broker/marketer of retail electric power in the Commonwealth of Pennsylvania.

Since Zentility will be providing electric generation supplier services to residential customers it is required to comply with, and be governed by, applicable Chapter 56 residential service regulations as set forth in the Commission Order *Guidelines for Maintaining Customer Service at the Same Level of Quality Pursuant to 66 Pa. C.S. §2807(d), and Assuring Conformance with 52 Pa. Code Chapter 56 Pursuant to 66 Pa. C.S. §2809(e) and (f)*, at Docket No. M-00960890 F0011, Order entered July 11, 1997. Thus, we deem it appropriate to reiterate certain items with respect to Chapter 56 of our regulations. Chapter 56 (52 Pa Code Chapter 56) is applicable to residential accounts. An electric generation supplier cannot physically disconnect a residential customer from the electricity grid; therefore, the rules relating to residential service termination are not applicable to electric generation suppliers. An electric generation supplier may seek to terminate its generation service through an appropriate written notice to the customer and the distribution company. The residential customer can then attempt to repair their relationship with the supplier, seek a new supplier, or return to utility service at default service rates in accordance with the utility's obligations under Section 2807(e), 66 Pa. C.S. §2807(e). The customer would only be disconnected from the electricity grid pursuant to appropriate regulations if the customer failed to meet its obligations to the utility or the electric generation supplier that has been designated by the Commission as the provider of last resort.

Additionally, we specifically note that the licensee must comply with, and ensure that its employees, agents, representatives and independent contractors comply with the standards of conduct and disclosure for licensees set out in Commission regulations at 52 Pa. Code §54.43 that were enacted to protect consumers of this Commonwealth. These standards include, *inter alia*, the provision of timely and accurate information about the services offered by the licensee, the practice of nondiscrimination in service in regard to race, color, religion, national origin, marital status, etc., the safeguarding of a consumer's personal information, and compliance with applicable state and federal consumer protection laws. We further note that the licensee and its agents must comply with the Commission's

sales and marketing regulations at 52 Pa. Code §111.1, et seq. applicable to residential customers. Among other things, these regulations require the licensee and its agents to provide accurate information about products and services being offered and prohibit a licensee and its agents from engaging in misleading or deceptive conduct and from making false or misleading representations. Also, we take this opportunity to remind the licensee of its agreement to abide by, and to ensure that its employees, representatives, agents and independent contractors abide by all applicable federal and state laws, and Commission regulations, procedures and orders, including Emergency Orders, which may be issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

Zentility did not provide a \$250,000 bond as required by the license application; however, it did provide a bond in the amount of \$10,000 and requests that the Commission reduce its security requirement from \$250,000 to \$10,000. In support of this request, Zentility explains that it will not be collecting any gross receipts from its customers, paying customer bills or taking title to electricity. Its services include analyzing client electricity loads and negotiating the purchase of electricity for its clients.

The Commission believes that the reasoning on which Zentility bases its request for a bond reduction from \$250,000 to \$10,000 is similar to that offered by the other EGSs that have successfully petitioned the Commission for a bonding level of \$10,000. Two of the EGSs are Co-eXprise, Inc. (Co-eX), at Docket No. A-110166, whose request was granted January 20, 2006, and Premier Solutions (Premier), at Docket No. A-110170, whose request was granted July 26, 2006. In the case of Co-eX, the company explained that, as a consultant, it will provide its customers with an evaluation and selection process from which to select the best positioned licensed electricity supplier/generator and award business. In the case of Premier, the company explained that it requested an EGS license to become EDI certified with the utilities, in order to be able to efficiently and effectively obtain electricity usage information for the customers to whom it provides consulting

services. Premier intended to utilize the information to help its customers reduce their overall spending for electricity. Premier also stated that it will not take title to power.

The Commission believes that Zentility operates in a similar manner and therefore should be granted similar relief and be permitted to provide a bond or other approved security in the reduced amount of \$10,000. However, Zentility's bonding level is contingent upon the company's business model as described in this Order. If Zentility takes title to generation supply for its customers, and/or charges customers directly for that generation supply, a \$10,000 level of bonding may not be appropriate. Therefore, we will direct Zentility to notify the Commission 45 days prior to a change in its business model, whereby Zentility takes title to generation supply and/or bills its customers directly for that generation supply. This will provide the Commission with an opportunity to review and adjust Zentility's approved bonding level prior Zentility implementing those changes.

Zentility has provided proofs of publication in the Pennsylvania newspapers and proofs of service to the interested parties as required by the Commission.

As of June 21, 2016, no protests have been filed.

We find that the applicant:

1. Is fit, willing and able to properly perform the service proposed in conformance with applicable provisions of the Public Utility Code and lawful Commission orders and regulations, specifically including 52 Pa. Code Chapter 56 (relating to Standards and Billing Practices for Residential Utility Service).
2. Has agreed to lawfully abide by all Commission regulations, procedures and orders, including Emergency Orders, which may be

issued verbally or in writing during any emergency situations that may unexpectedly develop from time to time in the course of doing business in Pennsylvania.

3. That the proposed service, to the extent authorized by the license, will be consistent with the public interest and the policy declared in the Electricity Generation Customer Choice and Competition Act.

Upon full consideration of all matters of record, we find that approval of this application is necessary and proper for the service, accommodation and convenience of the public; **THEREFORE,**

IT IS ORDERED:

1. That the application of Homeade LLC d/b/a Zentility is hereby approved, consistent with this Order.
2. That Homeade LLC d/b/a Zentility's request for a reduction in the bond level from \$250,000 to \$10,000 is hereby granted.
3. That the security amount of \$10,000 shall remain in effect for Homeade LLC d/b/a Zentility as long as Homeade LLC d/b/a Zentility does not make a change to its business model in Pennsylvania, whereby it would take title to generation supply and/or bill its customers directly for generation supply.
4. That a license be issued authorizing Homeade LLC d/b/a Zentility to begin to offer, render, furnish or supply electricity or electric generation services as a broker/marketer to residential, small commercial (25 kw and under demand), large commercial (over 25 kw demand), industrial, and governmental customers in all of the

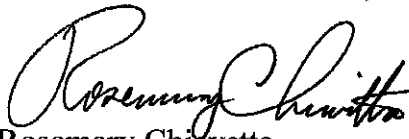
electric distribution company service territories throughout the Commonwealth of Pennsylvania.

5. That if Homeade LLC d/b/a Zentility proposes to change its business model as described in Ordering Paragraph No. 3, it must notify the Commission at least 45 days prior to the changes. With the notice, the Company must provide an update to the nature and scope of business information that was required by 52 Pa. Code § 54.40(c) to justify the modification granted in Ordering Paragraph No. 3. This will provide the Commission the opportunity to review Homeade LLC d/b/a Zentility's bonding level and adjust as appropriate, prior to Homeade LLC d/b/a Zentility implementing the proposed changes to its business model.

6. That if Homeade LLC d/b/a Zentility changes its business model without providing to the Commission the notice and information required in Ordering Paragraph No. 5, then the reduced bonding level permitted by Ordering Paragraph No. 2 shall cease effective with the date of the change in the business model. The level of bonding effective at that time shall be \$250,000 or the level required by 52 Pa. Code § 54.40, whichever is greater.

7. That this proceeding at Docket No. A-2016-2545195 be closed.

BY THE COMMISSION,


Rosemary Chiavetta
Secretary

(SEAL)

ORDER ADOPTED: June 30, 2016

ORDER ENTERED: June 30, 2016

PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-2016-2545195

EFFECTIVE DATE: June 30, 2016

The Application of Homeade LLC d/b/a Zenility for the right to begin to offer, render, furnish or supply electricity or electric generation services as a broker/market to residential, small commercial (25 kw and under demand), large commercial (over 25 kw demand), industrial, and governmental customers in all of the electric distribution company service territories throughout the Commonwealth of Pennsylvania.

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues, evidencing the Commission's approval, to the applicant this:

LICENSE FOR ELECTRIC GENERATION SUPPLIER AS A BROKER/MARKETER.

In Witness Whereof, the PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 30th day, of June, 2016.


Secretary

State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, 3rd Floor, Suite 314, P.O. Box 350, Trenton, New Jersey 08625-0350

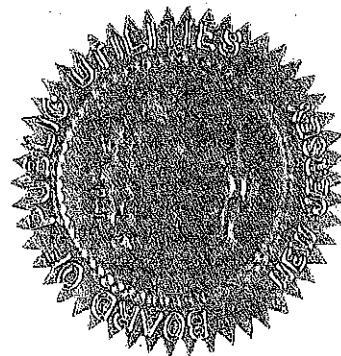
HEREBY REGISTERS

HomeADE, LLC
d/b/a Zentility

1724 Rt. 70E

Cherry Hill, New Jersey 08003

To conduct business in the State of New Jersey as an



Irene Kim Asbury
Energy Agent

Irene Kim Asbury
Secretary of the Board

Registration No. EA-0387
Effective Date: June 29, 2016
Expiration Date: June 28, 2017

State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, 3rd Floor, Suite 314, P.O. Box 350, Trenton, New Jersey 08625-0350

HEREBY REGISTERS

HomeADE, LLC
d/b/a/ Zentility

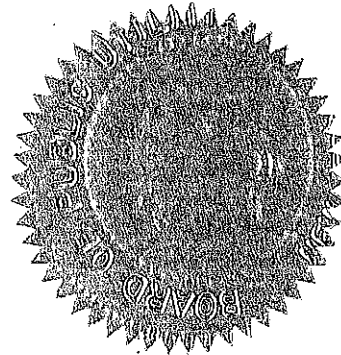
1724 Rt. 70E

Cherry Hill, New Jersey 08003

To conduct business in the State of New Jersey as a

Irene Kim Asbury Private Aggregator
Irene Kim Asbury
Secretary of the Board

Registration No. PA-0187
Effective Date: June 29, 2016
Expiration Date: June 28, 2017



State of New Jersey



Board of Public Utilities

44 South Clinton Avenue, 3rd Floor, Suite 314, P.O. Box 350, Trenton, New Jersey 08625-0350

HEREBY REGISTERS

HomeADE, LLC
d/b/a/ Zentility

1724 Rt. 70E

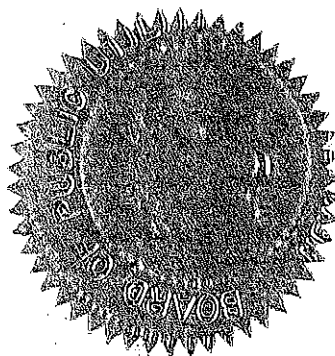
Cherry Hill, New Jersey 08003

To conduct business in the State of New Jersey as an

Irene Kim Asbury
Energy Consultant

Irene Kim Asbury
Secretary of the Board

Registration No. EC-0126
Effective Date: June 29, 2016
Expiration Date: June 28, 2017



STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

HomeADE, LLC d/b/a Zentility	:	
	:	
Application for Licensure of	:	16-0435
Agents, Brokers and Consultants	:	
under Section 16-115C of the	:	
Public Utilities Act.	:	

ORDER

By the Commission:

I. INTRODUCTION

On September 13, 2016, HomeADE, LLC d/b/a Zentility ("Applicant") filed a verified application with the Illinois Commerce Commission ("Commission") requesting a certificate of service authority to operate as an agent, broker, or consultant ("ABC") in Illinois pursuant to Section 16-115C of the Public Utilities Act ("Act"), 220 ILCS 5/1-101 et seq., and 83 Ill. Adm. Code 454, "Licensure of Retail Electric Agents, Brokers and Consultants" ("Part 454"). Applicant requests authority to offer services as an ABC for the procurement or sale of retail electricity supply for third parties in the State of Illinois. Upon review of the application, Staff of the Commission requested additional information and clarification of certain matters. On November 15, 2016, Applicant filed an Errata to its Application. Since all of the information to grant the requested relief was contained in the Application and Errata to the Application, the hearing was waived.

II. REQUIREMENTS FOR ALL APPLICANTS UNDER SECTION 16-115C OF THE ACT

Applicant is a business organized under the laws of Maryland and authorized to transact business in Illinois. Applicant has certified that it will comply with all applicable regulations; that it will comply with informational and reporting requirements established by Commission rule; that it will comply with informational and reporting requirements pursuant to Section 16-115C of the Act; and that it will comply with all other applicable laws, regulations, terms, and conditions required to the extent they have application to the services being offered by an ABC. Applicant has agreed to ensure that any person who acts on its behalf will comply with all applicable sections of Part 454. Applicant agrees that it will remain in compliance with the provisions of the Act and Part 454, and will ensure that authorizations received from customers, and all other applicable records are retained for a period of not less than three calendar years after the calendar year in which they were created. Applicant has agreed to adopt and follow rules and procedures

to preserve the confidentiality of its customers' data. The Applicant has also attested that no complaints have been filed against it for its provision of services in the electric or gas industry in the jurisdictions where it provides or is seeking to provide services.

III. FINANCIAL, TECHNICAL, AND MANAGERIAL REQUIREMENTS OF SECTION 16-115C

Applicant is required by Section 454.60 to demonstrate that it meets the managerial qualifications necessary to provide services as an ABC. Applicant must further provide an organizational chart that indicates the position of persons which satisfy the managerial qualification. Applicant has demonstrated that it meets the managerial qualifications set forth in Section 454.60 through Attachments C and E to the Application. Attachment D to the Application contains a corporate organizational chart and identifies the occupational background information of the persons being used to meet the requirements of Section 454.60(a). Attachment E contains occupational background information on the person or persons being used to meet the requirements of Section 454.60(a).

Applicant is required by Section 454.70 to demonstrate that it meets the technical qualifications necessary to provide services as an ABC. Applicant has demonstrated that it meets the technical qualifications set forth in Section 454.70 with the information provided in Attachments F and G. Attachment G contains occupational background information on the person or persons being used to meet the requirements of Section 454.70(a).

Pursuant to the requirements of Section 454.80 of Part 454, Applicant provided a surety bond in the amount of \$5,000 issued by a qualifying surety authorized to transact business in Illinois. Applicant further agrees to comply with the Code of Conduct for ABCs contained in Section 454.90.

IV. COMMISSION CONCLUSION AND CERTIFICATE OF SERVICE AUTHORITY

The Commission has reviewed the application and attachments along with the supplementary information provided by Applicant regarding the technical, managerial, and financial requirements and all other requirements of the Act and Part 454 and finds that the Applicant sufficiently demonstrates compliance with the requirements. The Commission concludes, therefore, that Applicant's request for a certificate of service authority to operate as an ABC in Illinois should be granted and should include the following authority:

CERTIFICATE OF SERVICE AUTHORITY

IT IS CERTIFIED that HomeADE, LLC d/b/a Zentility is granted service authority to operate as an agent, broker, or consultant for the procurement or sale of retail electricity supply for third parties in the State of Illinois.

V. FINDINGS AND ORDERING PARAGRAPHS

The Commission, having reviewed the entire record, is of the opinion and finds that:

- (1) HomeADE, LLC d/b/a Zentility, a business organized under the laws of Maryland and authorized to transact business in Illinois, seeks a certificate of service authority to operate as an ABC under Section 16-115C of the Act;
- (2) the Commission has jurisdiction over the party hereto and the subject matter hereof;
- (3) the recitals of fact and conclusions reached in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- (4) HomeADE, LLC d/b/a Zentility has demonstrated that it possesses sufficient financial, managerial, and technical resources and abilities to provide services as an ABC for the procurement or sale of retail electricity supply to third parties in the State of Illinois;
- (5) HomeADE, LLC d/b/a Zentility has complied with Section 16-115C of the Act and Part 454; and
- (6) HomeADE, LLC d/b/a Zentility should be granted a certificate of service authority to operate as an ABC as specified in this Order.

IT IS THEREFORE ORDERED by the Illinois Commerce Commission that HomeADE, LLC d/b/a Zentility is hereby granted a Certificate of Service Authority authorizing it to operate as an agent, broker, or consultant; said Certificate of Service Authority shall read as that set forth in Section IV of this Order.

IT IS FURTHER ORDERED that HomeADE, LLC d/b/a Zentility shall comply with all applicable Commission rules and orders now and as hereafter amended.

IT IS FURTHER ORDERED that, subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. Code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By Order of the Commission this 6th day of December, 2016.

(SIGNED) BRIEN SHEAHAN

Chairman